



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Mr. Peter Thomas
Coaltec Energy USA, Inc.
5749 Coal Drive
Carterville, Illinois 62918

March 8, 2018

Dear Mr. Thomas:

On January 15, 2018, you sent an email to the United States Environmental Protection Agency (EPA) Region 3 requesting our concurrence that drying and processing municipal biosolids in your "refractory-lined, oxygen-starved gasification process" is subject to Clean Air Act Section 112 standards for hazardous air pollutants (as opposed to CAA Section 129 standards for solid waste combustion). You indicate that you are in discussions with Allegheny County Sanitation Authority (ALCOSAN) to process their biosolids to produce powder activated carbon, and that you intend to hold discussions with other municipal wastewater treatment plants as well. You are requesting EPA guidance in potential applicability to CAA Sections 129 and 112 if you process the biosolids at approximately 982 degrees Celsius (1800 Fahrenheit).

This request is subsequent to a letter EPA Region 3 previously issued to Coaltec Energy USA, Inc. (Coaltec) on August 17, 2017, for a separate but similar project that used chicken litter in the process instead of municipal biosolids. In this letter, EPA Region 3 opined that the use of chicken litter in your unit, as described, would not be subject to CAA Section 129 standards for commercial/industrial/solid waste incineration units.

We recognize the similarities between the two projects Coaltec has proposed. However, we request additional information in order to assist you in this matter. Please provide the following information:

- 1) Define what "biosolids" are. At what point in the wastewater treatment process are the biosolids taken for processing in the Coaltec unit?
- 2) Provide a description of the "refractory-lined, oxygen-starved gasification process," including a temperature profile of the process.



*Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474*

- 3) The previous project used excess heat and a thermal oxidizer to sterilize chicken bedding. How is the excess heat being used in this process?
- 4) Please identify the location of the unit. Will it be located on the ALCOSAN site or off-site? Who is the owner/operator of the unit (ALCOSAN or Coaltec)?

If you have any questions, please contact Mr. Mike Gordon at 215-814-2039. His email address is gordon.mike@epa.gov.

Sincerely,



Gerallyn Duke
Acting Associate Director
Office of Permits and State Programs



*Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474*